

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

PETER J. MILLER, an individual,  
CLIFFORD HOYT, an individual, and  
CAMBRIDGE RESEARCH AND  
INSTRUMENTATION, INC.,  
a Delaware corporation,

Plaintiffs,

v.

PATRICK TREADO, an individual, and  
CHEMIMAGE CORP., a Delaware  
corporation,

Defendants.

**Civil Action No. 05-10367-RWZ**

**PLAINTIFFS' MOTION TO EXTEND  
DISCOVERY SCHEDULE**

Counsel for plaintiffs Cambridge Research and Instrumentation, Inc., Peter J. Miller, and Clifford Hoyt (collectively, "CRI") move to extend, by 90 days, the discovery schedule approved in the Court's March 30, 2006 minute entry (granting motion at [D.E. 29]).

Defendants, Patrick Treado and ChemImage Corp. (collectively, "ChemImage"), do not concur in the relief requested herein.

Submitted separately is a memorandum of reasons in support of this motion, pursuant to LR 7.1(b)(1).

Specifically, CRI requests the following amendments:

Event	Previously Scheduled Dates	Proposed Dates
Completion of fact discovery: deadline for: - completion of non-expert depositions - responses to all discovery requests	August 1, 2006	November 1, 2006
Identification of Experts (FRCP 26(a)(2)(A))	August 15, 2006	November 15, 2006
Opening Expert Reports - i.e., for which the party has the burden of proof (FRCP 26(a)(2)(B))	September 15, 2006	December 15, 2006
Rebuttal Expert Reports (FRCP 26(a)(2)(B))	October 15, 2006	January 15, 2007
Completion of Expert Depositions	November 15, 2006	February 15, 2007

Respectfully submitted,

**PETER J. MILLER, CLIFFORD HOYT,  
and CAMBRIDGE RESEARCH AND  
INSTRUMENTATION, INC.,**

Dated: July 14, 2006

/s/ Teodor Holmberg  
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**LOCAL RULE 7.1(A)(2) CERTIFICATION**

Counsel for Plaintiffs certifies that counsel for plaintiffs has conferred with counsel for defendants in a good faith attempt to resolve or narrow the issue presented in this motion, and counsel for defendants did not concur with plaintiffs' requested relief.

/s/ Teodor Holmberg  
Teodor J. Holmberg (BBO# 634708)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document (identified in the top right-hand corner) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 14, 2006, and a paper copy will be sent to the non-registered participant listed below:

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/s/ Teodor Holmberg  
Teodor J. Holmberg (BBO# 634708)

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**[PROPOSED] ORDER ADJUSTING DISCOVERY SCHEDULE**

It is hereby ordered that the following discovery schedule will replace and supersede the discovery schedule approved in the Court's March 30, 2006 minute entry (granting motion at [D.E. 29]):

<b>Event</b>	<b>Date</b>
Completion of fact discovery: deadline for: - completion of non-expert depositions - responses to all discovery requests	November 1, 2006
Identification of Experts (FRCP 26(a)(2)(A))	November 15, 2006
Opening Expert Reports - i.e., for which the party has the burden of proof (FRCP 26(a)(2)(B))	December 15, 2006
Rebuttal Expert Reports (FRCP 26(a)(2)(B))	January 15, 2007
Completion of Expert Depositions	February 15, 2007

Dated: \_\_\_\_\_, 2006

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RYA W. ZOBEL  
UNITED STATES DISTRICT JUDGE